

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America)
v.)
Joseline RAMOS) Case No.)
)
)
)
)
)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 23, 2018 - April 13, 2018 in the county of Webb in the Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

Title 18 United States Code,
Section 554, and 371

Did knowingly export or send from the U.S., or attempted to export or send from the U.S., 599 AK-47 magazines, contrary to any law or regulation of the U.S., or receives, conceals, buys, sells, or in any manner facilitates the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the U.S.

The defendant conspired with other persons to commit an offense against and to defraud the United States to acquire and transport the rifle magazines from the United States to Mexico in a manner contrary to law and without an export license.

This criminal complaint is based on these facts:

Please see attachment

Continued on the attached sheet.

/s/ Amy Rodriguez

Complainant's signature

Amy Rodriguez, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 07/03/2018

Judge's signature

City and state: Laredo, Texas

Diana Song Quiroga, US Magistrate Judge

Printed name and title

I am a Special Agent (SA) of the United States with Homeland Security Investigations (HSI), and have knowledge of the following facts:

1. On April 20, 2018 SAs with HSI Laredo interviewed Joseline RAMOS at the Laredo port of entry, bridge two. HSI Laredo had seized 200 AK-47 magazines on April 19, 2018, that were addressed to RAMOS and picked up from her doorstep. RAMOS was read her rights and waived them, agreeing to speak with SAs without a lawyer present.
2. RAMOS stated she received boxes at her residence but doesn't open them. An individual, who resides in Mexico, asked RAMOS for her address so he/she could ship stuff to her. RAMOS stated that individuals usually wait for the boxes. An individual will contact RAMOS and let her know people are coming to pick the boxes up. RAMOS thinks they are tracking the packages because they come so fast after the packages are delivered. RAMOS receives approximately two boxes every couple of days. RAMOS stated she was working April 19th and a female picked up the boxes from RAMOS doorstep. The female sent a picture of the boxes to someone and then took them from in front of RAMOS' apartment.
3. RAMOS never opened the boxes but knew there were weapon magazines and knew someone was taking them Mexico. RAMOS was paid \$100 for every box she received and was paid by the person who picked them up. RAMOS shook the boxes and heard metal on metal sounds. RAMOS thinks she received seven boxes so far. RAMOS could not identify any other individuals and did not believe anyone else was receiving packages.
4. SAs have identified invoices for 599 AK-47 magazines, totaling \$6443.17 shipped to RAMOS between March 23, 2018 and April 19, 2018.
5. Firearm magazines are identified on the United States Munitions List (USML) and illegal to export without a license.